



**THE CITY OF NEW YORK
LAW DEPARTMENT**

ZACHARY W. CARTER
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

CHRISTOPHER D. DELUCA
Assistant Corporation Counsel
Phone: (212) 356-3535
Fax: (212) 356-3509
Email: cdeLuca@law.nyc.gov

June 14, 2018

BY ECF

Honorable Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Belende Thelismond v. City of New York, et al.,
18-cv-02407 (ILG) (RER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney representing defendant City of New York (“City”) in the above-referenced matter. In that capacity, I write, with the consent of plaintiff’s counsel, Robert Marinelli, to respectfully request an enlargement of time from June 14, 2018 through June 28, 2018 for defendant City to provide plaintiff the names, shield numbers, and proper service addresses of all individual officers involved in the incident at issue in this litigation, as ordered by the Court on May 25, 2018. This is defendant’s second request to extend this deadline and the request does not affect any other scheduled deadlines. The Court granted defendant’s previous request for an extension.

This Office has provided plaintiff’s counsel with the names, shield numbers, and proper service addresses of multiple corrections officers involved in the incident at issue in this litigation, and has received investigative documents from the Department of Correction (“DOC”). However, there are still a few officers that need to be identified. Additionally, some of the officers have retired or no longer are employed by DOC. As such, DOC must contact these officers and ascertain whether or not they will consent to DOC accepting service on their behalf. Accordingly, the additional time will enable this Office to obtain the service address for the remaining few officers.

In view of the foregoing, it is respectfully requested that the Court grant the within request. Thank you for your consideration in this matter.

Respectfully submitted,

/s/

Christopher D. DeLuca
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Robert M. Marinelli, Esq. (By ECF)
Attorney for Plaintiff